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*Attorneys for NextEra Energy, Inc. et al.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

PG&E CORPORATION; PACIFIC GAS  
AND ELECTRIC COMPANY,

Plaintiffs,

vs.

FEDERAL ENERGY REGULATORY  
COMMISSION,

Defendant.

USDC ND CA Case No. 4:19-cv-00599-HSG

Adversary Proceeding No. 19-03003-DM

Chapter 11 Case Nos. 19-30088-DM &  
19-30089-DM

Chapter 11

(Jointly Administered)

**NOTICE OF PENDENCY OF OTHER  
ACTION OR PROCEEDING**  
(Case No, 4:19-cv-00781-HSG)

Pursuant to Rule 3-13 of this Court's Civil Local Rules (the "Local Rules"), NextEra Energy, Inc. and NextEra Energy Partners, L.P. (together, "NextEra"), intervenor-defendants in

1 the above-captioned adversary proceeding (the “Adversary Proceeding”) and movants in this  
 2 Court, hereby file this *Notice of Pendency of Other Action or Proceeding*, and state as follows:

3 The action styled *PG&E Corp., et al. v. Fed. Energy Regulatory Comm’n*, No. 4:19-cv-  
 4 00781-HSG (N.D. Cal.) (the “FERC Withdrawal Action” and, together with the above-captioned  
 5 action, the “Withdrawal Actions”) “involves all or a material part of the same subject matter and  
 6 all or substantially all of the same parties,” Local Rule 3-13(a), as the above-captioned action.  
 7 The FERC Withdrawal Action pertains to the Federal Energy Regulatory Commission’s (“FERC”)   
 8 motion to withdraw the reference of the Adversary Proceeding to the Bankruptcy Court.<sup>1</sup> The  
 9 above-captioned action pertains to NextEra’s motion (in which numerous intervenor-defendants  
 10 joined) to withdraw the reference of the same Adversary Proceeding to the Bankruptcy Court  
 11 (together, the “Withdrawal Motions”).<sup>2</sup>

12 The two Withdrawal Motions present precisely the same legal question: whether this Court  
 13 is required to withdraw the reference of the Adversary Proceeding to the Bankruptcy Court on the  
 14 grounds that “resolution of the [Adversary Proceeding] requires consideration of both title 11 and  
 15 other laws of the United States regulating organizations or activities affecting interstate  
 16 commerce.” 28 U.S.C. § 157(d). The parties with an interest in the two Withdrawal Actions are  
 17 identical because each Withdrawal Motion seeks withdrawal of the reference of the same  
 18 underlying Adversary Proceeding.

19 NextEra submits that in light of the overlap in legal issues and parties, coordination and/or  
 20 consolidation of the Withdrawal Actions would conserve the resources of the Court and the parties  
 21 and promote an efficient determination of the Withdrawal Motions.

22 *[Remainder of page intentionally left blank]*  
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26 <sup>1</sup> See Docket No. 1 in FERC Withdrawal Action.

27 <sup>2</sup> The Adversary Proceeding was automatically referred to the Bankruptcy Court in accordance  
 28 with this Court’s General Order No. 24 § 1.01(a) (adopted Dec. 27, 1982, last amended Feb. 22,  
 2016).

1 DATED: February 20, 2019

/s/ Samuel M. Kidder

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